

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**JESSE WILLMS, *et al.*,**

Defendants.

Case No. 2:11-cv-00828-MJP

**JOINT NOTICE OF SETTLEMENT  
PURSUANT TO GR3(b)**

**Note on Motion Calendar:** November 28,  
2011

Counsel for plaintiff Federal Trade Commission (“FTC” or “Commission”) and defendants jointly inform the Court pursuant to GR 3(b) that they have reached a settlement agreement in principle that resolves this matter with all defendants and eliminates the need for further litigation. Each of the defendants and counsel for defendants have signed a proposed Stipulated Final Judgment and Order for Permanent Injunction (“Final Order”).

On November 28, 2011, FTC counsel forwarded to the Commission its recommendation that the Commission authorize staff to sign and file the proposed Final Orders. The parties request that the Court suspend the existing case scheduling order, entered

on August 8, 2011, for ninety (90) days to allow the Commission to review and approve the proposed Final Orders.

**IT IS SO ORDERED**, this \_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
Marsha J. Pechman  
United States District Judge

Respectfully Submitted,

s/Kathryn C. Decker  
\_\_\_\_\_  
KATHRYN C. DECKER, WSBA #12389  
NADINE S. SAMTER, WSBA #23881  
ELEANOR DURHAM, MD. Bar  
JULIE K. MAYER, WSBA #34638  
RICHARD MCKEWEN  
Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174  
206-220-6350 (voice)  
206-220-6366 (fax)  
kdecker@ftc.gov  
nsamter@ftc.gov;  
edurham@ftc.gov;  
jmayer@ftc.gov  
rmckewen@ftc.gov

Attorneys for Plaintiff Federal Trade Commission

s/Jonathan N. Rosen  
\_\_\_\_\_  
JONATHAN N. ROSEN  
Shook, Hardy & Bacon, LLP  
1155 F Street, NW, Suite 200  
Washington, DC 20004-1305  
202-639-5608  
jrosen@shb.com

s/James A. Kaminski  
\_\_\_\_\_  
JAMES A. KAMINSKI  
Hughes & Bentzen, PLLC  
1100 Connecticut Avenue, NW, Suite 340  
Washington, D.C. 20036  
202-293-8975  
202-293-8973 (fax)  
jkaminski@hughesbentzen.com

s/Lynn Engel  
\_\_\_\_\_

1 LYNN ENGEL  
2 MOLLY A. TERWILLIGER  
3 Summit Law Group, PLLC  
4 315 Fifth Avenue, S., Suite 1000  
5 Seattle, WA 98104  
6 206-676-7000  
7 lynne@SummitLaw.com  
8 mollyt@SummitLaw.com

Attorneys for Defendants Jesse Willms; 1021018 Alberta Ltd.; 101636 Alberta Ltd.; 1524948  
Alberta Ltd.; Circle Media Bids Limited; Coastwest Holdings Ltd.; Farend Services Ltd.; JDW  
Media, LLC; Net Soft Media, LLC; Sphere Media, LLC; True Net, LLC; and Mobile Web  
Media, LLC

8 s/Dawn C. Stewart  
9 DAWN C. STEWART  
10 The Stewart Law Firm, PLLC  
11 1050 Connecticut Avenue, NW, 10<sup>th</sup> Fl.  
12 Washington, D.C. 20036  
13 202-772-1080  
14 202-293-8973 (fax)  
15 dstewart@thestewartlawfirm.com

Attorney for Defendants Peter Graver, Adam Sechrist, Brett Callister, Carey L. Milne, and  
Elizabeth Graver

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2011, I electronically filed the foregoing **JOINT NOTICE OF SETTLEMENT** with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

James A. Kaminski  
Hughes & Bentzen, PLLC  
1100 Connecticut Avenue, NW, Suite 340  
Washington, D.C. 20036  
202-293-8975  
202-293-8973  
jkaminski@hughesbentzen.com

Jonathan N. Rosen  
Shook, Hardy & Bacon, LLP  
1155 F Street, NW, Suite 200  
Washington, DC 20004-1305  
202-639-5608  
jrosen@shb.com

Lynn Engel  
Molly A. Terwilliger  
Summit Law Group, PLLC  
315 Fifth Avenue, S., Suite 1000  
Seattle, WA 98104  
206-676-7000  
lynne@SummitLaw.co  
mollyt@SummitLaw.com

Attorneys for Defendants Jesse Willms; 1021018 Alberta Ltd; 101636 Alberta Ltd; 1524948 Alberta Ltd; Circle Media Bids Limited; Coastwest Holdings Limited; Farend Services Ltd; JDW Media, LLC; Net Soft Media, LLC; Sphere Media, LLC; True Net, LLC; and Mobile Web Media, LLC

Dawn C. Stewart  
The Stewart Law Firm, PLLC  
1050 Connecticut Avenue, NW, 10<sup>th</sup> Fl.  
Washington, D.C. 20036  
202-772-1080  
202-293-8973 (fax)  
dstewart@thestewartlawfirm.com

Attorney for Defendants Peter Graver, Adam Sechrist, Brett Callister, Carey L. Milne, and Elizabeth Graver

DATED: November 28, 2011

/s/ Kathryn C. Decker  
Kathryn C. Decker  
Attorney for Plaintiff Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174  
206-220-4486  
206-220-6366 (fax)  
kdecker@ftc.gov